

Sharinn & Lipshie, P.C.
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September 9, 2016

VIA ECF

The Honorable Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Caroline Mayorga v. First Resolution Investment Corporation, et al.
U.S.D.C. – ED of NY Case No. 1:12-cv-00587-DLI-VVP**

Dear Judge Kuo:

The undersigned represents Defendants, Sharinn & Lipshie, P.C., Harvey Sharinn, Christopher Volpe, Stephen Goldenzweig, Scott Sharinn, and Amanda Moreno in connection with the above referenced matter.

As per Your Honor's request, counsel was to file by August 30, 2016 a joint proposed scheduling order, pursuant to which all missing documents/information will either a) be turned over by a specific deadline, or b) have an affidavit from defense counsel explaining why the documents/information are missing and counsel are also to propose an agreed-upon date for the next status conference. The parties respectfully requested, and were granted an extension, until September 9, 2016, in which to submit a joint proposed scheduling order.

After conferring via email and IN LENGTHY telephone calls, both parties are still reviewing and discussing the specific data points and requests. As this is a time consuming process, both parties are respectfully requesting an additional extension of time in which to submit the joint proposed scheduling order. Given both parties schedules, and the time needed to construct a clear and concise scheduling order, we are asking for a two (2) week extension, until September 23, 2016, in which to file the requested joint scheduling order.

Thank you in advance for your time and consideration.

Respectfully submitted,

By: Amanda Moreno

